

# Exhibit 2

ORIGINAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

UNITED STATES OF AMERICA :

- v. - : INDICTMENT

FREDERIC CILINS,  
a/k/a "Frederic Francois  
Marcel Cilins,"

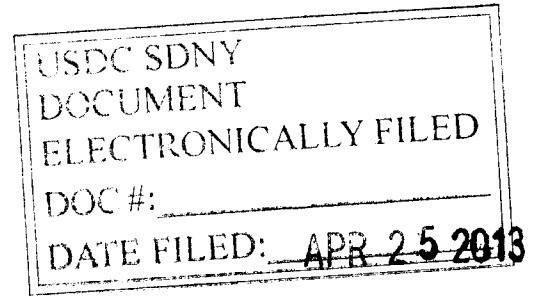
13 Cr CRIM 315

Defendant. :

- - - - - x

COUNT ONE

The Grand Jury charges:



1. From at least in or about March 2013, up to and including on or about April 14, 2013, in the Southern District of New York and elsewhere, FREDERIC CILINS, a/k/a "Frederic Francois Marcel Cilins," the defendant, did knowingly use intimidation, threaten, and corruptly persuade a person, and attempt to do so, and engage in misleading conduct towards another person, with intent to cause and induce a person to alter, destroy, mutilate, and conceal an object with intent to impair the object's integrity and availability for use in an official proceeding, to wit, CILINS agreed to pay money to an individual in exchange for that individual's agreement to provide to CILINS, for destruction, documents that were to be produced before a grand jury in the Southern District of New York.

(Title 18, United States Code, Sections 1512(b)(2)(B) and 2.)

JUDGE WOOD

COUNT TWO

The Grand Jury further charges:

2. From at least in or about March 2013, up to and including on or about April 14, 2013, in the Southern District of New York and elsewhere, FREDERIC CILINS, a/k/a "Frederic Francois Marcel Cilins," the defendant, did knowingly use intimidation, threaten, and corruptly persuade a person, and attempt to do so, and engage in misleading conduct towards another person, with intent to hinder, delay, and prevent the communication to a law enforcement officer of the United States of information relating to the commission and possible commission of a Federal offense, to wit, CILINS directed an individual to make false statements to special agents of the Federal Bureau of Investigation regarding the commission and possible commission of Federal offenses.

(Title 18, United States Code, Sections 1512(b)(3) and 2.)

COUNT THREE

The Grand Jury further charges:

3. From at least in or about March 2013 up to and including on or about April 14, 2013, in the Southern District of New York and elsewhere, FREDERIC CILINS, a/k/a "Frederic Francois Marcel Cilins," the defendant, knowingly and corruptly, did obstruct, influence, and impede an official proceeding and did attempt to do so, to wit, CILINS agreed to pay money to an individual in exchange for that individual's agreement to provide

to CILINS, for destruction, documents that were to be produced before a grand jury in the Southern District of New York.

(Title 18, United States Code, Sections 1512(c)(2) and 2.)

COUNT FOUR

The Grand Jury further charges:

4. From at least in or about March 2013 up to and including on or about April 14, 2013, in the Southern District of New York and elsewhere, FREDERIC CILINS, a/k/a "Frederic Francois Marcel Cilins," the defendant, willfully and knowingly did endeavor by means of bribery to obstruct, delay, and prevent the communication of information relating to a violation of a criminal statute of the United States by a person to a criminal investigator, to wit, CILINS agreed to pay money to an individual in exchange for that individual's agreement to sign a document containing false statements relating to violations of criminal statutes of the United States under investigation by special agents of the Federal Bureau of Investigation.

(Title 18, United States Code, Sections 1510(a) and 2.)

COUNT FIVE

The Grand Jury further charges:

5. From at least in or about March 2013 through on or about April 14, 2013, in the Southern District of New York and elsewhere, FREDERIC CILINS, a/k/a "Frederic Francois Marcel Cilins," the defendant, did knowingly alter, destroy, mutilate,

conceal, cover up, falsify, and make false entries in records, documents, and tangible objects, and did so with the intent to impede, obstruct, and influence the investigation and proper administration of a matter within the jurisdiction of a department and agency of the United States, namely the United States Department of Justice, and in relation to and in contemplation of such matter, to wit, CILINS provided to an individual, for that individual's signature, a document containing false statements, knowing that those false statements related to a criminal investigation being conducted by the Federal Bureau of Investigation.

(Title 18, United States Code, Section 1519.)

FORFEITURE ALLEGATION

6. As a result of committing the offenses alleged in Counts One through Four of this Indictment, FREDERIC CILINS, a/k/a "Frederic Francois Marcel Cilins," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of these offenses, including but not limited to a sum of United States currency representing the amount of proceeds obtained as a result of the offenses.

7. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

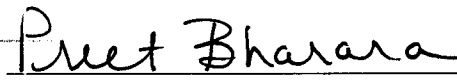
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

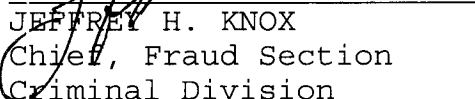
(Title 18, United States Code, Section 981;  
Title 21, United States Code, Section 853(p); and  
Title 28, United States Code, Section 2461.)



FOREPERSON



PREET BHARARA  
United States Attorney



JEFFREY H. KNOX  
Chief, Fraud Section  
Criminal Division  
U.S. Department of Justice

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

FREDERIC CILINS,  
a/k/a "Frederic Francois  
Marcel Cilins,"

Defendant.

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INDICTMENT

13 Cr. \_\_\_\_ (\_\_\_\_)

(Title 18, United States Code,  
Sections 981, 1510, 1512(b)(2)(B),  
1512(b)(3), 1512(c)(2), 1519; Title 21,  
United States Code, Section 853(p); Title  
28, United States Code, Section 2461.)

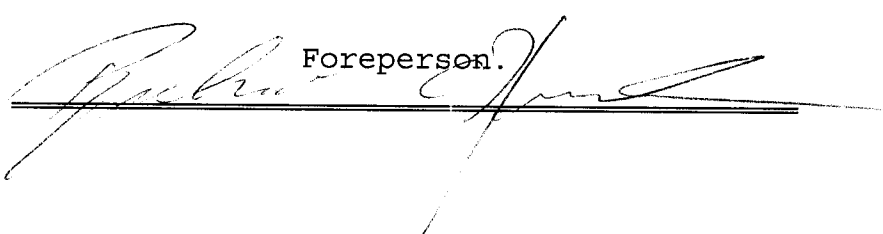
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PREET BHARARA

United States Attorney.

A TRUE BILL

Foreperson.



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April 25, 2013

Filed Indictment. Case assigned to Judge. What.  
U.S.M.S. Debra Freeman